

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

STATE OF RHODE ISLAND, et al.,

Plaintiffs,

v.

C.A. No.:

DONALD J. TRUMP, et al.,

Defendants.

DECLARATION OF KAREN MELLOR

I, Karen Mellor, pursuant to 28 U.S.C. § 1746, hereby declare that the following is true and correct:

1. I am over the age of eighteen and understand the obligations of an oath.
2. I have personal knowledge of all facts stated herein or have knowledge of the matters based on my review of information and records gathered by my staff.
3. I am the Chief of Library Services at the Rhode Island Office of Library and Information Services (“OLIS”), and I have held this role since 2013. As Chief, I am responsible for the strategic vision and programming of OLIS, the state library agency for Rhode Island. As of August 2023, I am also responsible for the strategic vision and management of Digital Services, which includes knowledge management, web services, and online government applications available through RI.gov. Both units are part of the Rhode Island Division of Enterprise Technology Strategy and Services within the Department of Administration.
4. I have worked at the Office of Library and Information Services since 1999, first as a Library Program Specialist and then as a Library Program Manager. I graduated from Brown

University with an AB in Semiotics and then earned my Masters in Library and Information Science from Simmons University.

5. I submit this declaration in connection with the announcement by the Institute of Museum and Library Services (“IMLS”) on March 31, 2025, that it was placing all staff on Administrative Leave, effective immediately. *See* Attachment A. On the same date, I received an email from IMLS informing me that IMLS staff would no longer be available to assist with the grant programs or other services. *See* Attachment B. One day later, on April 1, 2025, I received notice that IMLS would recall 12 staff as a “skeleton crew.”
6. IMLS is an agency within the National Foundation on the Arts and the Humanities headed by a Director responsible for the development and implementation of policy to ensure the availability of museum, library, and information services adequate to meet the essential information, education, research, economic, cultural and civic needs of the people of the United States and to carry out programs of research and development, data collection, and financial assistance “to extend and improve the museum, library, and information services of the people of the United States” and thereby ensure that such services “are fully integrated into the information and education infrastructure of the United States.” 20 USC § 9103.
7. OLIS was created by R.I. Gen. Laws § 29-3.1-1 “to cooperate with the Institute of Museum and Library Services of the United States of America in the carrying out of the purposes of any and all acts of Congress for the benefit of library and information services within this state.”
8. OLIS has the mission of “strengthening, connecting and empowering libraries to advance knowledge, connect communities. and enrich the lives of all Rhode Islanders.”
9. As Chief of OLIS, I am responsible for allocating IMLS funding to support the OLIS-administered library network coordinating resources, access, programs, and services to 48

public library systems, 12 academic libraries, 81 public school libraries, and 8 special libraries for a total of 149 libraries with 178 library facilities, and to residents of the state of Rhode Island. Approximately 370,725 Rhode Islanders (34% of the population) hold public library cards. Approximately 1,000 Rhode Islanders are served through OLIS' Talking Books Library. 136,154 K-12 students and 32,190 undergraduates at Rhode Island's state colleges and universities have access to learning tools and research databases coordinated by OLIS. In total, more than half (over 540,000 people) of the state's population have direct access to services and programs provided by or coordinated by OLIS, and the entire population of the state has the opportunity to freely use the state's libraries and OLIS online services.

10. Given my experience, I do not think that IMLS can meet its obligations to administer the programs described below.

Grants to States Program

11. I am familiar with the Grants to States program, a formula grant program whereby IMLS must pay State Library Administrative Agencies ("SLAAs"), including OLIS, the Federal share of the cost of activities described in the State plan as approved by the IMLS Director. 20 U.S.C. §§ 9133-34.
12. OLIS is the State library agency that submits the Five-Year State Plan, as required by 20 USC § 9134, and receives reimbursement from IMLS for the Federal Government's share of the costs of implementing that Plan every two months. Every grant under the Grants to States Program is active for a two-year period. All funding for the execution of this plan has been expended on services and programs that directly benefit Rhode Island's libraries and residents of the state since the inception of the IMLS in 1996.

13. OLIS allocates a significant amount of IMLS Grants to States Program funding to individual libraries and library-serving organizations through subgrants. For example, in FY2024, OLIS distributed \$42,084 in IMLS funding to 42 public libraries for their summer reading programs via a formula grant process. OLIS also distributed \$203,760 in IMLS funding via competitive grants to libraries for various projects, including digitization of historic copies of local newspapers, services for veterans and differently abled individuals, social services, learning programs, and collection development. OLIS funds projects both big and small. For example, OLIS provided \$900 in funding to Jamestown Philomenian Library to support summer reading programs for children and teens. Libraries in the City of Providence received a total of \$37,865 to support summer reading programs; a project at the Community Libraries of Providence for engaging children with local nature through outdoor programming, implementation of interactive nature stations using technology, and exhibits at the library; and an internship in digital librarianship at the Providence Public Library for a student from the University of Rhode Island Graduate School of Library and Information Studies.
14. OLIS also relies on Grants to States funding for its own staff, programs, and contractual services. In 2024, 45% of the OLIS budget, including the equivalent of 6 full-time employees, was covered by the Grants to States Program.
15. The State of Rhode Island has received Grants to States funds from the federal government every year since the program's inception in 1996.
16. Rhode Island is currently in year three of its Five-Year State Plan for Library Services and Technology Act Funding (2023-2027), which was approved by the Library Board of Rhode Island on June 13, 2022, submitted to the IMLS State Programs Office in June, 2022, and approved by IMLS on September 14, 2022.

17. In 2024, IMLS distributed \$180 million to fund 1,500 projects in all 50 states, the District of Columbia, 5 territories, and 3 Freely Associated States through the Grants to States Program.

18. In 2024, Rhode Island received \$1,413,623 through the Grants to States Program.

19. In accordance with its Five-Year State Plan, OLIS allocates the Grants to States funding to support the following programs:

- a. A Resource Sharing Program to facilitate efficient statewide sharing of materials among public, academic, school and other libraries, and achieves savings for municipalities and academic institutions while expanding access to educational, informational, and recreational reading materials for all Rhode Islanders; facilitate borrowing and sharing of physical materials among libraries through an interlibrary loan program outside of the state; and provide access to databases, learning resources, and ebooks through a centralized online portal (AskRI) and partner websites;
- b. The Talking Books Library, Rhode Island's Regional Library for the Blind and Print Disabled, providing access to public library services for state residents who are unable to use traditional print materials due to visual or print disability;
- c. A Digitization, Preservation and Disaster Preparedness Program to provide tools and resources to assist with disaster preparedness; increase access to collections at libraries through digitization; develop a single point of access to the digital collections of libraries, museums and cultural heritage organizations through the establishment of a RI Digital Library;
- d. A Continuing Education Program to develop a regular schedule of training, workshops, and meetings aligned with needs identified in the library community, including topics such as youth services, library management, adult services, special collections, and

- trustee training; develop programs in partnership with other organizations; provide physical materials and online resources to support learning; and coordinate with other organizations to develop a systematic and coordinated approach to the professional development of librarians and library staff;
- e. A Reading and Literacy Program to coordinate reading programs for children, teens and adults at public and school libraries statewide and partnerships with organizations to promote, support or develop statewide programs focused on early literacy, grade level reading, and statewide reading; provide training for library staff on the implementation of local reading programs for youth of all ages and abilities; support for book award programs and collection development activities; and subgrants to public libraries to support summer reading programs for children and teens;
 - f. A 21st-Century Literacy Program to coordinate and provide trainings statewide at libraries on topics such as digital, financial, health, and information literacy, plus partnerships with state agencies and organizations to expand access to relevant programs and trainings;
 - g. A Community Outreach and Engagement Program to work with partnering organizations to lead programs and identify resources to create welcoming environments in libraries that minimize linguistic, cultural and other barriers to access; work with partners to increase participation in the profession; identify resources, programs, and partners to better meet the needs of underserved groups such as veterans, older adults, individuals with disabilities, minorities, families with economic challenges, and individuals who are incarcerated or families impacted by incarceration;

and award subgrants to support the development of programs and services to address specific library and information needs in local communities;

- h. A Community Connectors Program to seek partnerships and collaborate with organizations to expand access to statewide programs in adult education, workforce development, and small business support, and identify and promote opportunities for libraries to collaborate with statewide or local social service agencies to deliver services or resources at libraries;
 - i. A Local Library Development Program to provide consultant services to support and advance youth services, adult services, and library management; collect data, publish analyses, and provide evaluative tools and information; publish online resources for the public and library community such as library directories, library job postings, news, and events; strengthen library connections through participation in library organizations and networks; provide grants to support innovative projects and programs at libraries; and conduct a systematic program of outreach to libraries to better align project objectives and services.
20. Any delays, interruptions, or reductions in funding as a result of a reduction of force in IMLS will have a direct impact on access to libraries and library materials across the State by hobbling OLIS's ability to implement the Five-Year State Plan as described above.
21. The State currently anticipates receiving the above-listed funds and continuing to fund the programs.
22. The State does not have the budgetary resources or flexibility to make up for the lost funding.
23. In addition to administering funds, IMLS supports Rhode Island libraries by providing guidance with its National Strategic Plan, input into the formation of Rhode Island's Five-Year

State Plan, regular conferences and peer-to-peer meetings on library development, data collection and analyses, and various other trends in library science,

24. Thus, if IMLS funding is disrupted, library access for thousands of Rhode Islanders would suffer, hobbling OLIS in its efforts to foster literacy, support learning and workforce development, and enhance community throughout the State.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 1st day of April, 2025, in Providence, Rhode Island.



Karen Mellor
Chief of Library Services
Rhode Island Office of Library and Information Services

EXHIBIT A



INSTITUTE of
Museum and Library
SERVICES

Acknowledged Receipt: _____

Date: _____

March 31, 2025

To: ALL IMLS Employees

From: Director of Human Resources

Re: Administrative Leave for IMLS Employees

This is to inform you that you are being placed on administrative leave (i.e., non-duty paid status) starting Monday, March 31, 2025, up to a period of 90-days. You will be on administrative leave with full pay and benefits. This administrative leave is not being done for any disciplinary purpose.

While you are on administrative leave, you are not permitted on IMLS premises. I regret that such directions are necessary, but we must safeguard legitimate IMLS interests and systems. If you wish to enter IMLS premises for official IMLS business, you must first contact me to arrange your visit.

While you are on administrative leave, OHR will handle your time and attendance. Your email will be suspended. You can reach me at my desk number, 202-653-4728, or via email: adotson@imls.gov

Please understand that this action is not punitive but rather is taken to facilitate the work and operations of the agency. Your pay and benefits will not be affected and will continue during this period.

Please contact me if you have any questions about this letter.

Sincerely,

Antoine L. Dotson

Antoine L. Dotson
Director of Human Resources

EXHIBIT B



FOR IMMEDIATE RELEASE: Official Statement from AFGE Local 3403 on the Status of Museum and Library Services

From Mellor, Karen (OLIS) <karen.mellor@olis.ri.gov>

Date Mon 3/31/2025 3:38 PM

To Paul Meosky <pmeosky@riag.ri.gov>

[External email: Use caution with links and attachments]

This Message Is From an External Sender

This message came from outside your organization.

Report Suspicious

From AFGE (government workers union), a few more facts.

From: Emily Curry <ERCurry@cooleypublicstrategies.com>

Sent: Monday, March 31, 2025 3:32:51 PM

Subject: FOR IMMEDIATE RELEASE: Official Statement from AFGE Local 3403 on the Status of Museum and Library Services

Please see statement below from the American Federation of Government Employees Local 3403. For questions, please email ercurry@cooleypublicstrategies.com



A Statement from AFGE Local 3403 on the Status of the Institute of Museum and Library Services

Earlier today, the Institute of Museum and Library Services notified the entire staff that they are being placed on administrative leave immediately. The notification followed a brief meeting between DOGE staff and IMLS leadership. Employees were required to turn in all government property prior to exiting the building, and email accounts are being disabled today. Museums and libraries will no longer be able to contact IMLS staff for updates about the funding they rely upon.

In the absence of staff, all work processing 2025 applications has ended. The status of previously awarded grants is unclear. Without staff to administer the programs, it is likely that most grants will be terminated.

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Emily Curry

COOLEY PUBLIC STRATEGIES

o. 615.742.8112 | m. 937.825.2835 | ecurry@cooleyps.com

213 Overlook Drive | Suite A-1 | Brentwood, TN 37027

To unsubscribe, send a request to info@cosla.org. For more information, contact COSLA Executive Director Jeremy Johannesen at jjohannesen@cosla.org.

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